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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAM A. MUNDELL Arizona Corporation Commission
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JIM IRVIN

COMMISSIONER

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COMMISSIONER

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IN THE MATTER OF RULES TO ADDRESS
SLAMMING AND OTHER DECEPTIVE
PRACTICES

Docket No. RT-00000J-99-0034

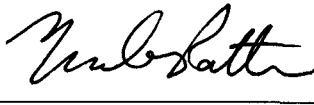
ARIZONA WIRELESS CARRIERS GROUP'S
RESPONSE TO STAFF'S SUPPLEMENTAL COMMENTS

Pursuant to the July 9, 2002 Procedural Order in this docket, the Arizona Wireless Carriers Group (Alltel Communications, AT&T Wireless, Leap Wireless/Cricket Communications, Sprint PCS, Verizon Wireless, Voicestream, Western Wireless, and Nextel) submit responsive comments to Staff's Supplemental Comments, filed July 12, 2002.

The Arizona Wireless Carriers Group appreciates the Staff's effort to clarify Rule 2012 in response to the concerns raised in the filed comments and the public comment session. Although Staff's proposed revisions address some of the issues raised and are an improvement on the current version of Rule 2012, the Arizona Wireless Carriers Group still believes that Rule 2012 – even as revised – would be unduly burdensome. The wireless industry sales practices are already subject to consumer protection laws that address misleading or other improper marketing activities, such as the Arizona Consumer Fraud law, A.R.S. § 44-1521 *et seq.* The Arizona Wireless Carriers Group submits that the proposal set forth in its June 7, 2002 comments – in which scripts would be provided to Staff in connection with actual complaints or in response to a specific request for review from the Commission – is a more appropriate balancing of benefit against burden than is the annual wholesale submission of marketing scripts.

1 RESPECTFULLY SUBMITTED July 24, 2002.

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